



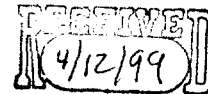
**Melaleuca, Inc.**

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Legal Department  
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April 1, 1999

Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, S.W.  
Washington, DC 20204

**Re: SECTION 403(r)(6) NOTIFICATION**

Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, Melaleuca, Inc., notifies FDA that it has begun using the following statements:

Need a wellness boost? Activate your defenses

Boosts your body's natural defenses to give you more fighting power

Helps maintain the strength of your white blood cells

Echinacea: In clinical studies, patients taking echinacea demonstrated stronger immune systems

Astragalus: Shown in studies to strengthen the antibody response

Arabinogalactan: A natural carbohydrate that enhances the activity of those cells which attack invading microbes

Vitamins C, E, and Folic Acid: Each contains strong immune-boosting properties

Adults and children: take at the first sign that the immune system needs help

These statements contain the statutory disclaimer. The name of the dietary supplement is Activate Immune Complex™, and the relevant dietary ingredients are Echinacea purpurea, Arabinogalactan, Astragalus membranaceus, Vitamin C, Vitamin E, Folic Acid, Zinc and Selenium.

I certify that the foregoing is complete and accurate, and that Melaleuca, Inc., has substantiation that the statements are truthful and not misleading.

Very truly yours,

Melaleuca, Inc.

  
McKay Christensen  
Chief Operating Officer

MC/ds

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